

# **Exhibit B**

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From: [leonid.feller@kirkland.com](mailto:leonid.feller@kirkland.com)  
To: [beachlawyer51@hotmail.com](mailto:beachlawyer51@hotmail.com)  
CC: [Steve@hbsslaw.com](mailto:Steve@hbsslaw.com)  
Subject: RE: Orange County Suit  
Date: Mon, 14 Jul 2014 18:12:25 +0000

Mark, thanks. As you and I discussed this morning, we're in the process of drafting a revised version of the stay stipulation to incorporate the Bankruptcy Court's 7/8/2014 Order Establishing Stay Procedures for Newly Filed Cases, and will send the draft to you for review once it's prepared. In the interim, we have agreed that neither side will take any further action in State of California v. General Motors LLC, Case No. 30-2014-00731038-CU-BT-CXC (Orange Cty. Sup. Ct.) prior to General Motors LLC filing a notice of removal in the case during the week of Aug. 4. Thereafter, once the draft stay stipulation is provided to you, plaintiff either will enter into the stay stipulation (subject to the opportunity to seek relief after September 1) or will file a no-stay pleading within three business days pursuant to the provisions of the 7/8/14 Order. Please let me know if this is not our understanding, and I hope you have a great trip to Europe.

Best,  
Lenny

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[leonid.feller@kirkland.com](mailto:leonid.feller@kirkland.com)

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From: Beach Lawyer [<mailto:beachlawyer51@hotmail.com>]  
Sent: Monday, July 14, 2014 9:42 AM  
To: Feller, Leonid  
Subject:

Lenny

Would you please send me a copy of the Stay Stipulation for my review?

Mark

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